# Privacy Policy

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## 1. Introduction

Your privacy is important to us. To better protect your privacy, we provide this information which explains our information practices and the choices you can make about the way your information is collected and used. To make this policy easy to find, we make it available throughout our website and at every point where personally identifiable information may be requested.

Any questions relating to Data Privacy within Next Stage for Fostering or this Policy should be sent to Paula Kelly, Data Compliance Officer.
E: **paula.kelly@nextstageforfostering.co.uk**
Address: Next Stage for Fostering, 28 Manchester Road, Westhoughton, Bolton, BL5 3QJ.
T: 01204 201203.

This privacy notice tells you what to expect when Next Stage for Fostering collects personal information. It applies to information we collect about:

- Visitors to our website
- People who use our services, e.g. who subscribe to our newsletter or request a publication from us
- People who enquire to become a foster carer with us
- People who become approved as Foster Carers with us
- Complainants and other individuals in relation to data protection

## 2. Visitors to our Website

When someone visits www.nextstageforfostering.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of our website. This information is only processed in a way which does not identify anyone. The information is held for statistical reporting purposes only. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## 3. People who contact us via social media

We manage social media interactions inhouse and via a third party, Rumpus Limited.

The social media platforms that we use are Facebook, Instagram, Twitter, You-Tube, WhatsApp and LinkedIn. Please see each of the individual social media websites for the terms of their privacy policies in how they manage information you share via their platforms.

If you send us a private or direct message via social media the message will be stored in line with each platforms privacy policy.

If you send us personal information through private messaging to enquire with us about becoming a foster carer, please see enquiry details for how we use and manage your personal data.

## 4. People who enquire to become a Foster Carer with us – How we will use your data?

When you enquire to become a Foster Carer with us either through our website enquiry page, social media or by telephone we will capture and record information about you such as your name, telephone number, email address and postal address. Next Stage for Fostering use a third party provider, Social Care Network Solutions Limited to record information. They have developed and provide a service consisting of internet access to application software at its remote computer location, for recording information. This software is referred to as the CHARMS database system. All enquiry information will be stored on the CHARMS database system.

Next Stage for Fostering occasionally store and process information in a SharePoint system that sits within Microsoft UK Data Centres, information is backed up by Microsoft. Next Stage for Fostering use a third-party provider Venom IT to manage this site on our behalf.

| Stage | Type of Information Gathered | Reason for gathering data |
|---|---|---|
| Initial web form | Basic contact details as per enquiry form | To assess applicants suitability/ability to become a foster carer and ensure all children's safeguarding laws are met |
| Suitability telephone conversation | More comprehensive personal information gathered | |
| Initial home visit | Assessment of the applicants, home/safety of environment etc. | |
| In-depth assessment process | Fully comprehensive detailed information e.g. health, criminal records, financial suitability etc.* | |
| *A further consent form will be required at the assessment stage to allow for checks, e.g. Local Authority, DBS and references etc. | | |

Use of information for closed applications (Carer Recruitment)

| Closure Stage | Maximum time data held once closed | Reason for holding data |
|---|---|---|
| No Contact | 12 months | Remarketing/reopening of applications* |
| Contact made | 2 years | Remarketing/reopening of applications* |
| After initial visit | 3 years | In line with Fostering Regulations |
| During Assessment process | 3 years | In line with Fostering Regulations |
| All personal information will be stored solely on our Agency systems. | | |

If you submit your personal data to us via an enquiry form on one of our webpages, we will accept this as consent for us to contact you with information regarding fostering.

If a decision is made to move to the assessment stage of the process you will be required to complete an application and consent form, we will ask for additional information such as your nationality, religion, employment and previous employment, GP details and referee details. We will use your consent to provide authorisation for us to share your information with organisations and referees to complete necessary checks on you as part of your assessment. These checks will include medical checks with your GP, personal references, current/previous employment references, voluntary work references, education references, local authority checks, criminal record checks, landlord checks, health visitor check, self-employment checks and health and safety checks. Other checks may be required which will be discussed and agreed with you.

We use the information that you provide about yourself and any other relevant people to fulfil your request to enquire, apply and be approved as a foster carer with us.

We will also share all information that you have provided to us and that we have obtained through the required checks with a registered social worker will be employed by Next Stage for Fostering or an independent social worker who we have contracted to undertake fostering assessments for us. We share this information in order for them to undertake your fostering assessment.

Once you have entered the Assessment Stage of the process, if the assessment closes, we will retain all information provided and checks completed to date for three years following the

closure of the assessment. This is to comply with our legal obligations under the Fostering Service Regulations 2011.

## 5. Approved Foster Carers – How we will use your personal data?

Once you have been approved and whilst you continue to be approved as a Foster Carer through Next Stage for Fostering, we will continue to store and process information about you to comply with our legal obligations under the Fostering Service Regulations 2011, the Children Act 1989 & 2004 and Fostering Service National Minimum Standards.

**Where our use of your information is for the purposes of our legitimate business needs or the legitimate business needs of our contractors.** For example: We also keep a record of any communications between us and you, for example emails and phone calls, because we need it to help us fulfil your requests, keep in touch with you, and offer you communications that are relevant to you, for example providing you with membership to The Fostering network.

**Where our use of your information is necessary for us to carry out a task in the public interest -** We share information with the Police, Local Authority, Ofsted or other agencies where we consider that a child or young person may be at risk of harm.

To be approved and continue approval as a Foster Carer with Next Stage for Fostering we will need to update some of the checks on a regular basis that were completed at the assessment stage to assess your continued suitability as an approved foster carer. These checks will include medical checks, criminal record checks and health and safety checks.

We will also collect and process the following data from you:

- Information you consent to provide to Next Stage for Fostering that is required to carry out our obligations arising from any contracts entered between you and us, or potential contracts that may be in liaison between you and us.
- Information that you consent to provide by filling in forms on our website, or as part of any direct marketing or sales activities. This includes and is not limited to personal information about you such as your name, telephone contact number, geographical address/location, email address and interests.
- If you contact us by telephone or in writing, we may keep a copy of your correspondence or communication.
- Details of your visits to our website and the resources that you access.

If you have provided us with the personal data of another person, there is a clear requirement imposed by Next Stage for Fostering for you to confirm that you consent to the processing of your personal data and that you have informed them of our identity as a Data Controller and the nature of the processing taking place. Records will be retained as evidence of this consent.
We use information held about you in the following ways:

- Where we need to perform the contract, we are about to enter or have entered with you.
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

If a child's personal data is submitted to us to provide the service of foster care, we will process this data in accordance with the law.

We will not share your data with third parties for other marketing purposes unless we have your express consent to do so.

**Opting Out**
For purposes outside of our contract, such as sending you marketing emails and invitations to events, or e-newsletters we will require you to provide consent as a legal basis for processing your personal data in this way. You have the right to withdraw consent to marketing communications at any time by contacting us and requesting to be removed from the marketing distribution list.

When you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a service we are providing, such as completing a fostering assessment.

## 6. Our commitment to Data Security

To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect. We follow strict security in the storage and disclosure of your personal data, and to protect it against accidental loss, unauthorised access, destruction or damage. Personal information is held by us electronically and is stored on secure computer systems and we have control who has access to them.

Our staff receive data protection training and we have data protection policies and procedures in place which individuals are required to adhere to.

If we use external companies to collect or process personal data on our behalf, we undertake detailed checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collected or have access to.

From time to time Next Stage for Fostering's website may contain links to and from third party websites. If you follow a link to these websites, please note that these websites have their own privacy polies and that Next Stage for Fostering does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 7. Changes to our Privacy Policy

If we make changes to our Privacy Policy, this policy will be updated on our website.

## 8. Your rights relating to Personal Data

Under the General Data Protection Regulations (GDPR) you have a number of 'rights' to ensure you are treated fairly by Next Stage for Fostering.

**Request information** – about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.

**Request access** – to your personal information (known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction –** of the personal information that we hold about you. This enables you to request to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** (The Right to be Forgotten) – of your personal information erased and to prevent processing in some specific situations, however please be aware that Next Stage for Fostering can refuse to comply with some or all a request as we are legally bound to retain certain information to comply with fostering service regulations.

**Object to processing** – of your personal information, e.g. if you decide during the application process that you no longer want to continue to become a foster carer then once the decision is finalised and documented we will restrict processing of your data. Unless we are obliged to comply with a further process under the fostering regulations. We will continue to store your data in line with our retention policy.

**Object to automated decision-making and profiling** – that is not subject of any automated decision-making by us using your personal information or profiling of you.

**Request the restriction of processing** – of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request transfer** – of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to have a copy of your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

**Withdraw consent** – in those circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we

received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 9. Retention of your information

Next Stage for Fostering operate a clear Maintaining, Storing and Accessing Records policy and procedure to ensure personal data is kept only for so long as is necessary for the purpose for which such information is used.

For more information please request a copy of the **Data Protection policy**.

## 10. Disclosure of your information

As part of our GDPR compliance obligations, we are duty bound to check when personal data may be shared with third parties to ensure that they apply the same or greater controls in terms of data protection. The use of non-disclosure agreements forms part of our third-party data sharing controls.

We may disclose your personal information to third parties

- if we are under a duty to disclose or share your personal data to comply with any legal obligation or to enforce or apply other agreements; or
- to protect the rights, property or safety of Next Stage for Fostering, our foster carers or others.

## 11. Next Stage for Fostering current Cookie Policy

### What is a cookie?

A cookie is a small piece of text that is stored on your computer, phone or other mobile device when using a browser to connect to the internet. Cookies have many uses but specifically, they are used to store information about you on your computer. Unless you have specifically set your computer to reject cookies, websites will already have been using cookies to enhance your online experience.

### How we use cookies

Next Stage for Fostering uses cookies to gain a better understanding of our customers so that we can provide a better online experience. This applies to all visitors to our website, in all jurisdictions.

Most websites automatically accept cookies; however, you may delete, or disable cookies in your browser settings. Please note that you may not be able to take full advantage of our website if you disable the cookies.
The cookies we use on www.nextstageforfostering.co.uk collect basic information about our visitors including what pages have been visited and how they found our website. The

information we gather does not identify anyone and we make no attempt to find out who has been to our site.

What we do gain from this information is a better understanding of what our users are interested in on our website and how we can improve the experience.

## The cookies we use

Our website uses Google Analytics, a web analytics service provided by Google. The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers. Google will use this information for evaluating your use of our website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process this information on Google's behalf. Google will not associate your IP address with any other data held by Google. Further information about Google's privacy policy may be obtained from http://www.google.com/privacy.html.

We use Google Analytics remarketing codes to log when users view specific pages or take specific actions on the website. This allows us to provide targeted advertising in the future. If you do not wish to receive this type of advertising from us in the future you can opt out using the DoubleClick opt-out page
https://www.google.com/settings/ads/onweb#display_optout

Facebook, if provided, your email address may be used to create custom audiences on Facebook. Custom audiences are used to deliver advertisements to website visitors on Facebook based on email addresses. We do this to target other potential foster carers/potential employees through pre-defined criteria set by the marketing platform. We use this data in accordance with Facebook's Data Use Policy which can be found in https://www.facabook.com/about/privacy

Conversion tracking, Google AdWords/Bing Adverts. Our website uses Google AdWords and Microsoft Bing adverts conversion tracking features on certain pages. If you contact us online, the destination page will have code on it that will help us understand the path you took to arrive on that page. Whilst this information is not personally identifying, we may use AdWords or Bing services to serve advertisements to you based on the pages you visit on our website.

## Managing your cookies

For further information on how to manage your cookies with a specific browser, please click the appropriate link below:

- Internet Explorer
- Firefox
- Google Chrome
- Safari
- Safari iOS
- Android

- Windows Phone

## 12. Making a Complaint

If you are not happy with the way that Next Stage for Fostering has handled collecting and using your personal information and you want to make a complaint you can contact us by emailing complaints@nextstageforfostering.co.uk.

Alternatively, or if you are not happy with our response to your complaint, you can contact the Information Commissioners Office directly to report a concern on 0303 123 1113 or via their website which is https://ico.org.uk/concerns